

EXHIBIT

4

ANDREA VALDEZ (Cal. Bar No. 239082)
530 S. Lake Avenue, No. 574
Pasadena, CA 91101
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andrea.valdez.esq@gmail.com

JOSEPH SCOTT ST. JOHN (*pro hac vice*)
514 Mockingbird Drive
Long Beach, MS 39560
Tel: 410-212-3475
jscottstjohnpublic@gmail.com

Attorneys for Objector Douglas W. St. John

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION**

Master File No. 3:07-cv-5944 JST

MDL No. 1917

**DECLARATION OF ATTORNEY
JOSEPH SCOTT ST. JOHN ISO
DOUGLAS W. ST. JOHN'S REPLY
ISO HIS OBJECTION**

This Document Relates To:
All Indirect Purchaser Actions

Judge: Hon. Jon S. Tigar

Special Master: Hon. Martin Quinn

1 I, Joseph Scott St. John, declare and state as follows:

2 1. I am an attorney duly licensed in the State of Mississippi, the State of Louisiana, and
3 the District of Columbia. I represent Douglas W. St. John, a resident of the State of Mississippi, in
4 connection with the above-captioned matter.

5 2. I make this declaration in support of Objector Douglas W. St. John's Reply in
6 Support of His Objection.

7 3. I have personal knowledge of the facts stated herein, and if called and sworn as a
8 witness, I would testify truthfully as follows.

9 **PROFESSIONAL BACKGROUND**

10 4. I earned a B.S. in Systems Engineering, with Merit, from the United States Naval
11 Academy in 2003.

12 5. I earned a J.D., with Honors, from The George Washington University Law School
13 in 2008.

14 6. From January 2012 until June 2015, I practiced law as an associate at Covington &
15 Burling LLP in Washington, DC.

16 7. I have never previously served as counsel in connection with a class action objection.

17 8. I have never filed a class action objection on my own behalf.

18 9. IPP Counsel associate me with Anna St. John, an attorney who practices with the
19 Center for Class Action Fairness ("CCAF"), a nationally well-regarded non-profit organization that
20 protects consumers against abusive class action settlements. *See, e.g.,* Adam Liptak, N.Y. TIMES, *When*
21 *Lanyers Cut Their Clients Out of the Deal* (Aug. 13, 2013) at A12 (referring to CCAF founder Ted Frank
22 as "[t]he leading critic of abusive class-action settlements"). CCAF seems to have earned this
23 reputation through its successful litigation record. *See, e.g.,* *Redman v. Radio Shack Corp.*, 768 F.3d 622
24 (7th Cir. 2014); *Pearson v. Nbtj, Inc.*, 772 F.3d 778 (7th Cir. 2014); *In re HP Inkjet Printer Litig.*, 716
25 F.3d 1173 (9th Cir. 2013); *In re Dry Max Pampers Litig.*, 724 F.3d 713 (6th Cir. 2013); *In re Bluetooth*
26 *Headset Prods Liability Litig.*, 654 F.3d 935 (9th Cir. 2011).

27 10. I have never served as counsel on any legal matter with Ms. St. John, and I have
28 never appeared in the same case as Ms. St. John.

CONTRACT ATTORNEYS

11. On December 3, 2015, I spoke with attorney Brandon Isleib via telephone. Mr. Isleib confirmed that he worked as a contract attorney for Sherman Kasso. Mr. Isleib stated that Mr. Kasso initially paid him \$25 per hour, but Mr. Kasso increased his pay to \$30 per hour at some point.

12. Exhibit 1 is a true and accurate copy of a LinkedIn profile for Brandon Isleib.

ST. JOHN DEPOSITION

13. Exhibit 2 is a true and accurate copy of excerpts from the deposition of Douglas W. St. John.

14. Mr. St. John's deposition testimony was referenced in a previous filing. *See* (D.E. 4174) at 2-4. The citations in that filing were to the deposition audio rather than the transcript, hence they differ from the citations in Exhibit 2.

15. Exhibit 8A is a true and accurate copy of Exhibit 8 to the deposition of Douglas W. St. John

16. Exhibit 8B is a true and accurate copy of document STJOHN030, which corresponds to Exhibit 8 to the deposition of Douglas W. St. John.

17. Exhibit 9A is a true and accurate copy of Exhibit 9 to the deposition of Douglas W. St. John

18. Exhibit 9B is a true and accurate copy of document STJOHN031, which corresponds to Exhibit 9 to the deposition of Douglas W. St. John.

19. Exhibit 10 is a true and accurate copy of an excerpt from Exhibit 10 to the deposition of Douglas W. St. John

20. Exhibit 11 is a true and accurate copy of Exhibit 11 to the deposition of Douglas W. St. John.

21. Exhibit 12 is a true and accurate copy of Exhibit 12 to the deposition of Douglas W. St. John.

22. Exhibit 13A is a true and accurate copy of Exhibit 13 to the deposition of Douglas W. St. John.

23. Exhibit 13B is a true and accurate copy of document STJOHN038, which corresponds to Exhibit 13 to the deposition of Douglas W. St. John.

24. Exhibit 14 is a true and correct copy of excerpts from Exhibit 14 to the deposition of Douglas W. St. John.

25. Further declarant sayeth naught.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in New Orleans, Louisiana, the 9th day of December, 2015

/s/ Joseph Scott St. John

Joseph Scott St. John

EXHIBIT

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Brandon Isleib

3rd

Legislation Editor at City of Seattle

Federal Way, Washington | Law Practice

Previous Weinstein Kitchenoff and Asher, Code Publishing, Wizards of the Coast**Education** The University of Alabama School of Law[Send Brandon InMail](#)**205**
connections[Contact Info](#)<https://www.linkedin.com/in/brandon-isleib-03771118>

Background



Summary

I work in legislation and ordinance review. Counting my contributions to the Hardball Times Annual series, I have written approximately 180 articles on either baseball or Magic: the Gathering. I have performed and produced a sketch comedy show for UK charity Comic Relief. Renton, WA studied my proposal to improve traffic flow. I am proficient in making my bio sound more impressive than it is.



Experience

Legislation Editor

City of Seattle

January 2015 – Present (1 year) | Greater Seattle Area

Liaise with various City departments to ensure technical and content accuracy of drafted legislation before it receives legal review.

Tier 2 Supervisor/Lawyer

Weinstein Kitchenoff and Asher

February 2013 – January 2015 (2 years)

Online document review for antitrust class action suits.

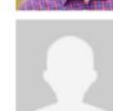
Legal Reviewer

Code Publishing

October 2012 – January 2015 (2 years 4 months) | Seattle

Read municipal codes start to finish for substantive issues (e.g. vagueness or statutory conflicts), recommending revisions as appropriate.

People Also Viewed

**Harry Jo**
Planeswal**William Z**
Conductor**Marco M**
Blogger pr**Jim Davi**
Writer at S**Mike Car**
Freelance**Karla Oli**
Owner of I
LEGO Sto**Jason Ki**
Integrated
Social Me
Agency**Rollin Bi**
Writer/Edi**Justin St**
Grounds &
Opelika, A**Dylan Rippe**
Level 1 Judge at Magic



Advanced

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Monitored Magic Online premier events; also helped build and migrate pages and content for the new Magic and Dungeons & Dragons websites.

Columnist

Gathering Magic

January 2012 – March 2014 (2 years 3 months)

Essentially a continuation of my work at Muse Vessel but with a broader audience and more pizzazz.

Tier 1 Reviewer/Lawyer

Law Office of Sherman Kassof

September 2010 – June 2012 (1 year 10 months)

Online document review for antitrust class action suits.

Columnist/Co-Founder

Muse Vessel

January 2011 – December 2011 (1 year)

Weekly writer on casual Magic. Entire site merged into Gathering Magic at the end of 2011.

Columnist

Hardball Times

March 2008 – February 2010 (2 years)

Biweekly writer on sabermetric and historical baseball topics; read by officials for every major league team; interviewed Cy Young Award winner David Price; published in five books.

Substitute Teacher

Faulkner University

October 2009 – December 2009 (3 months)

Taught four upper-level class sessions: two in Courts and Courtroom Procedure; and two in Criminology.

Consultant

W.S. Newell

November 2009 – November 2009 (1 month)

Analyzed a highway construction issue to advise on legal strategy and evidentiary strength.

Law Clerk

Adcox Lewis Smyth Winter

June 2006 – September 2007 (1 year 4 months)

For six attorneys, researched in Westlaw, Lexis, PACER, and courthouses, drafted and refined motions and briefs, and conducted client interviews in areas including but not limited to: bankruptcy; capital defense; class action product liability; deeds; unlawful detainer; and workers' compensation.

Intern

ACEC Alabama

December 2005 – April 2006 (5 months)

As one of a three-person office, assisted in tracking bills in the Alabama legislature and coordinating events, such as legislative receptions to serve as a liaison between member organizations and the state

Business Service

You

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B



Advanced



Home Profile Connections Jobs Interests

Business Service



Publications

How to Stop Setting Fires: Understanding Negligent Speech

May 26, 2014



Skills

Top Skills

20 Legal Research



14 Document Review



6 Microsoft Excel



5 Magazine Articles



3 Editing



2 Songwriting



2 Sketch Comedy



2 Class Actions



2 Public Speaking



1 Leadership



Brandon also knows about...

1 Legal Writing

1 Microsoft Office



Education

The University of Alabama School of Law

J.D., Law

2006 – 2009

A, Free Speech Seminar, Fall 2008

A-, Sports Law, Fall 2008

A-, Political and Legislative Writing, Spring 2008

A/Best Paper, Commerce Clause Seminar, Fall 2007

A-, Legislation, Fall 2007



Advanced



Home Profile Connections Jobs Interests

Business Service

Valedictorian

Criminal Justice Award, 2006

Activities and Societies: [Alpha Phi Sigma](#), [Alpha Chi](#)

Additional Info

• Interests

[Songwriting](#), [audio production](#), [baseball history](#)

• Personal Details

Birthday September 18

• Advice for Contacting Brandon

E-mail is the most reliable method of contacting me.



Organizations

Additional Organizations

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EXHIBIT

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION PLAINTIFF
VERSUS CIVIL ACTION NO: 07-CV-05944-SC; MDL NO.1917
THIS DOCUMENT RELATES TO:
ALL INDIRECT PURCHASER ACTIONS DEFENDANT

DEPOSITION OF DOUGLAS W. ST. JOHN

Taken at 4302 W. Beach Boulevard,
Wingate Beach Hotel, Gulfport, Mississippi,
Monday, November 2, 2015, beginning at 10:02 a.m.

APPEARANCES:

REPRESENTING PLAINTIFF:

MARK J. SCHIRMER, ESQUIRE
Straus & Boies, LLP
1355B Lynnfield Road, Suite 245
Memphis, Tennessee 38119
mschirmer@straus-boies.com

REPRESENTING DOUGLAS W. ST. JOHN:

JOSEPH SCOTT ST. JOHN, ESQUIRE
514 Mockingbird Drive
Long Beach, Mississippi 39560
jscottstjohnpublic@gmail.com

REPORTED BY:

JENNIFER RAY, CCR, RPR
CCR # 1419

1 DOUGLAS W. ST. JOHN

2 the witness, having been produced and
3 first duly sworn, testified as follows, to-wit:

4 EXAMINATION

5 BY MR. SCHIRMER:

6 Q. Would you, please, state your name for
7 the record, sir.

8 A. Douglas Wayne St. John.

9 Q. Do you have a lawyer with you
10 representing you here today?

11 A. Yes. Joseph St. John.

12 Q. Okay. Do you know of any other
13 counsel who is representing you in connection
14 with your -- with the reason you're here today?

15 A. No.

16 MR. JOSEPH ST. JOHN: Counsel, for the
17 record, can you state who you are representing?

18 MR. SCHIRMER: Sure. I represent -- I
19 am one of the attorneys who represents a class of
20 indirect-purchaser parties in the in re (CRT)
21 cathode ray tube antitrust litigation. I'm from
22 the firm Straus and Boies.

23 MR. JOSEPH ST. JOHN: Okay. Counsel,
24 for the record, I'm objecting to your
25 qualifications to take the deposition. Post

1 be all his life, which is probably true.

2 Other than in connection with what's
3 going on here today, has he ever served as your
4 lawyer?

5 A. No.

6 Q. Where do you live, sir?

7 A. Long Beach, Mississippi.

8 Q. And we are in Long Beach, Mississippi?

9 A. No.

10 Q. We're in Gulfport?

11 A. We're in Gulfport.

12 Q. Okay.

13 A. Long Beach is on the west side of
14 Gulfport.

15 Q. It's that way, behind you?

16 A. Yes.

17 Q. What do you do for a living now?

18 A. I'm retired.

19 Q. Good for you.

20 What did you do before you retired?

21 A. I was an engineer with the Southern
22 Company.

23 Q. What was your job as an engineer,
24 might I ask?

25 A. I did system protection.

1 Q. Could you explain that for somebody
2 who knows nothing about that?

3 A. All power system equipment has devices
4 on it to detect and de-energize it in the event
5 something goes wrong, from the transformers at
6 your house all the way -- and its equipment that
7 when they detect fault, whatever the affected
8 part is, they shut it down, and that's what I
9 did.

10 Q. Okay. Did you ever work for a company
11 that sells cathode ray tubes, products that are
12 made of cathode ray tubes?

13 A. No.

14 Q. Have you ever given testimony under
15 oath before today? Well, let me explain. There
16 could be an affidavit, where you signed it, and I
17 know -- other than today -- and I know you signed
18 an objection and some papers in connection with
19 this. Other than those papers and sitting here
20 today in front of Jenny and with Mr. St. John,
21 your attorney, have you ever given testimony
22 under oath before today?

23 MR. JOSEPH ST. JOHN: Objection.
24 Vague. I'm sure the witness has probably signed
25 an affidavit with a bank or something at some

1 Q. And you said that your son told you
2 about the litigation?

3 A. Yes.

4 Q. And informed --

5 MR. SCHIRMER: Object to form.

6 BY MR. JOSEPH ST. JOHN:

7 Q. And informed you that you might be a
8 class member?

9 A. Yes.

10 MR. SCHIRMER: Object to form.

11 BY MR. JOSEPH ST. JOHN:

12 Q. Whose idea was it to object to this
13 litigation?

14 A. Mine.

15 MR. SCHIRMER: Object to form.

16 BY MR. JOSEPH ST. JOHN:

17 Q. Why did you feel the need to object?

18 A. The original -- when they set up the
19 cartel -- you can say it was a very small amount
20 or whatever, but all the people who bought
21 cathode ray tubes, whether they be TV, computer
22 monitors or whatever, those people got cheated.
23 Looking at the amount of the settlement request
24 by the attorneys, they are about to get cheated
25 again, and I think that is unfair, so that is

1 what my objection is.

2 Q. And do you recall specifically what
3 you've said that led down this path to filing the
4 objection?

5 MR. SCHIRMER: Object to form.

6 A. Is there some -- there should be some
7 way to object to the size of the settlement, and,
8 yes, you can object to it.

9 BY MR. JOSEPH ST. JOHN:

10 Q. That was the answer?

11 A. That was -- that was -- how -- how do
12 I object, yes, you can object to the size --
13 since you are in the -- since you're one of the
14 people that got cheated, you can object to the
15 settlement.

16 Q. Mr. St. John, you were asked by
17 opposing counsel if I had ever served as your
18 lawyer before. Do you recall that question?

19 A. Yes.

20 Q. And you said -- forgive me for
21 paraphrasing -- but you thought this was the
22 first time?

23 A. Okay. Yes.

24 Q. Did you ever ask me for legal advice
25 in connection with the land for which you were a

1 Q. Is that encapsulated to your
2 understanding within Footnote 1?

3 A. Yes.

4 MR. JOSEPH ST. JOHN: Madam court
5 reporter, I have three exhibits. I don't know
6 which number we're on.

7 THE COURT REPORTER: 7.

8 MR. JOSEPH ST. JOHN: So it will be 7,
9 8, and 9.

10 (Off the record.)

11 (Exhibits 7 - 9 marked for identification.)

12 BY MR. JOSEPH ST. JOHN:

13 Q. Mr. St. John, do you recognize
14 Exhibits 7, 8, and 9?

15 A. Yes.

16 Q. What is Exhibit 7?

17 A. Say it again, please.

18 Q. What is Exhibit 7?

19 A. Exhibit 7 is a television that is
20 located at my house.

21 Q. Exhibit 8?

22 A. That is the back of same.

23 Q. Exhibit 9?

24 A. Again, the back of same.

25 Q. Are Exhibits 7, 8, and 9 accurate

1 representations of the JVC television that you
2 own?

3 A. Yes.

4 Q. Does Exhibit 9 accurately represent a
5 label on the back of the JVC television that you
6 own?

7 A. Yes.

8 Q. Is there a warning on that label about
9 taking off the back of the television?

10 A. Yes. It says, "Caution. Risk of
11 electric shock. Do not open." And then that's
12 the actual label there, and then just to the
13 right it says, "Shock hazard. Do not open."

14 MR. JOSEPH ST. JOHN: Madam court
15 reporter, I have Exhibit 10.

16 - - -

17 (Exhibit 10 marked for identification.)

18 BY MR. JOSEPH ST. JOHN:

19 Q. Mr. St. John, do you recognize Exhibit
20 10?

21 A. Yes.

22 Q. What is Exhibit 10?

23 A. That is the user's guide for the
24 television located at my house.

25 Q. Looking at what would be Page 2, it's

1 on the front page.

2 A. Okay.

3 Q. Is there a warning?

4 A. Yes. "Risk of electric shock. Do not
5 open."

6 MR. JOSEPH ST. JOHN: Madam court
7 reporter, I have Exhibit Number 11.

8 - - -

9 (Exhibit 11 marked for identification.)

10 MR. JOSEPH ST. JOHN:

11 Q. Mr. St. John, do you recognize Exhibit
12 Number 11?

13 A. I recognize it, yes.

14 Q. Can you identify Exhibit Number 11?

15 A. It is the Service Manual for the TV
16 we've previously been looking at.

17 Q. The JVC television that you own?

18 A. Yes.

19 Q. Turning to Page 3. It's the page with
20 Number 3 at the bottom.

21 A. 3. Okay.

22 Q. Looking at Paragraph 4.

23 A. Yes.

24 Q. Is there a warning about hot chassis?

25 A. Yes.

1 Q. What can you explain what a hot
2 chassis means?

3 A. It means the power cord is connected
4 directly to the chassis. There is no transformer
5 involved in the connection of it. There's no
6 transformer isolating the television from the
7 power system.

8 Q. Is a hot chassis dangerous?

9 A. It can be. Yes.

10 Q. Please turn to Page 30.

11 A. (Witness complies.)

12 Q. Does Page 30 of Exhibit 11 identify
13 CRT tube number for the component CRT?

14 A. Yes.

15 Q. Does Exhibit 11, to your knowledge,
16 identify the manufacturer for the component CRT?

17 A. No.

18 MR. SCHIRMER: Where is Page 30? I
19 see 28, 29, and then N-O, and then the next one
20 says 39, but I don't know why. Maybe I'm just
21 missing -- you're dealing with the second 29 and
22 30.

23 MR. JOSEPH ST. JOHN: It's an --

24 MR. SCHIRMER: That one?

25 MR. JOSEPH ST. JOHN: Correct.

1 BY MR. JOSEPH ST. JOHN:

2 Q. Mr. St. John, are you able to identify
3 the tube manufacturer for the component CRT of
4 this JVC television using publically available
5 information?

6 A. No.

7 Q. In your experience, are service
8 manuals for consumer electronics freely
9 available?

10 A. No.

11 Q. You generally have to pay for them?

12 A. Right.

13 MR. JOSEPH ST. JOHN: Madam court
14 reporter, I'm going to mark Exhibits 12 and 13,
15 12 being the screen and 13 being the label.

16 - - -

17 (Exhibits 12 and 13 marked for identification.)

18 BY MR. JOSEPH ST. JOHN:

19 Q. Mr. St. John, do you recognize
20 Exhibits 12 and 13?

21 A. Yes.

22 Q. What is Exhibit 12?

23 A. Exhibit 12 is the TV that I own
24 currently at Gulf Shores.

25 Q. What is Exhibit 13?

1 A. It is the back of same TV.

2 Q. Does Exhibit 13 accurately represent
3 the back of the back of the Panasonic television
4 that you own?

5 A. Yes.

6 Q. And I know it may be difficult to see,
7 but is there a warning about taking off the back
8 of that Panasonic television?

9 A. Yes. There is imprinted in the
10 plastic just to the top right of the -- the top
11 right corner of the label there is a -- it says,
12 "Shock hazard. Do not open." It's very
13 difficult to read, but it says "shock hazard"
14 just to the right and above the label.

15 MR. JOSEPH ST. JOHN: Thank you.

16 Madam court reporter, I'm gonna mark
17 Exhibit 14.

18 - - -

19 (Exhibit 14 marked for identification.)

20 BY MR. JOSEPH ST. JOHN:

21 Q. Mr. St. John, do you recognize Exhibit
22 14?

23 A. Yes.

24 Q. What is Exhibit 14?

25 A. It's the operating manual for the TV,

1 this previous TV we just looked at, the
2 Panasonic.

3 Q. Exhibit 14 is printed with two pages
4 per physical piece of paper. On the right side
5 of the front page, is there a warning?

6 A. Yes.

7 Q. What does the warning say?

8 A. "Risk of electric shock. Do not open.
9 To reduce the risk of electric shock do not
10 remove cover or back. No user-serviceable parts
11 inside. Refer servicing to qualified service
12 personnel."

13 Q. Mr. St. John, the warnings that we've
14 reviewed on the instruction manual or the user
15 manual and the backs of your televisions, as a
16 consumer, would these warnings detour you from
17 opening those televisions?

18 MR. SCHIRMER: Object to form. Calls
19 for speculation.

20 BY MR. JOSEPH ST. JOHN:

21 Q. Mr. St. John, are you a consumer?

22 A. Yes.

23 MR. SCHIRMER: Asks for an expert
24 opinion.

25 A. I am.

1 MR. JOSEPH ST. JOHN: And, madam court
2 reporter, I want to mark Exhibit 15. It is an
3 excerpt from Rely Brief in Support of
4 Indirect-Purchaser Plaintiffs' Motion For Class
5 Certification, docket entry 1654, dated April
6 25th, 2013.

7

8 (Exhibit 15 marked for identification.)

9 BY MR. JOSEPH ST. JOHN:

10 Q. Mr. St. John, I'd like to direct you
11 to Page 38, Line 20.

12 A. Okay.

13 Q. It states, "The tube manufacturer can
14 be identified by using the product model number
15 printed on the outside of the unit. The model
16 number can be matched with the corresponding
17 service guides, service manuals or other
18 publically available information to reveal the
19 tube number, which is unique to a specific
20 manufacturer."

21 Mr. St. John, do you believe this
22 statement is misleading?

23 A. It is.

24 Q. Why?

25 MR. SCHIRMER: Object.

1 A. First off, the manuals do not specify
2 the tube manufacturer. They specify a model
3 number. I tried to identify some of the
4 manufacturers by using the model numbers
5 available, and I was unable to do so.

6 BY MR. JOSEPH ST. JOHN:

7 Q. And was that with respect to the JVC
8 television?

9 A. Yes.

10 Q. Turning to Page 39, Lines 4 through 9,
11 it states that, "The tube maker can be identified
12 by removing the screws from the back of the
13 product and viewing the name of the tube maker or
14 the tube number, which is typically printed in
15 large, bold letters on the tube itself."
16 "Contrary to defendants' assertions, this is a
17 simple process that can be accomplished in a few
18 moments with the use of a screwdriver."

19 Do you see that statement, Mr. St.
20 John?

21 A. Yes.

22 Q. Do you believe that statement is
23 misleading?

24 A. Yes.

25 MR. SCHIRMER: Object to form.

1 BY MR. JOSEPH ST. JOHN:

2 Q. Why? You can answer, Mr. St. John.

3 A. The -- all the documentations, the
4 labels, they say don't go in there, it's high
5 voltage. And so while somebody, yes, they could
6 be -- they could remove the screws and go in
7 there, the voltage does not go to zero instantly
8 when the unit is turned off, and there is a shock
9 hazard inside.

10 Q. Couldn't a consumer eliminate the risk
11 of that shock hazard by simply unplugging the
12 television?

13 A. No.

14 Q. Can you explain why not?

15 A. The TV is using the -- CRTs use very
16 high voltage. Rough estimate, measuring the
17 diagonal of the tube, it's about 1,000 volts in
18 each, and it takes several minutes -- when the TV
19 is turned off or unplugged, it takes some minutes
20 for that voltage to decay down to nonlethal
21 levels, and if there are some failures
22 internally, which would not be readily apparent,
23 it may be substantially longer for the voltage to
24 decay.

25 Q. Let's talk about your educational and

1 professional background for a minute. Did you
2 serve in the military, Mr. St. John?

3 A. Yes.

4 Q. Did you receive training in
5 electronics repair from the military?

6 A. Yes. I went to the Air Force basic
7 electronics and advanced electronics school.

8 Q. What type of equipment did you work
9 on?

10 MR. SCHIRMER: Object to form.

11 A. I worked on the ground transmitters
12 for -- that the aircraft used for navigation
13 purposes.

14 BY MR. JOSEPH ST. JOHN:

15 Q. Did that equipment include high
16 voltages?

17 A. Yes. The -- it was all tube-type
18 equipment, and all of it involved voltages
19 ranging from several hundred -- and there was one
20 unit that ranged -- we had 13 KV on them.

21 THE COURT REPORTER: You had 13 what?

22 A. Kilovolts, 13,000 volts.

23 BY MR. JOSEPH ST. JOHN:

24 Q. Did the Air Force train you on how to
25 work safely on that equipment?

1 A. Yes.

2 Q. Were you skilled in the repair of that
3 equipment?

4 A. Yes.

5 Q. How skilled?

6 A. I was sent to a duty station in
7 Northern Thailand, and I was the sole maintenance
8 man for the equipment located at that site. From
9 November -- or excuse me -- from September until
10 May, I was the only technician working there.

11 Q. September until May of what year, sir?

12 A. 1969.

13 Q. That's an interesting year. How
14 important was the navigational equipment that you
15 were working on in Thailand?

16 MR. SCHIRMER: Object to form.

17 BY MR. JOSEPH ST. JOHN:

18 Q. Do you know how important the
19 navigational equipment you were working on was?

20 A. Yes. It -- I was told -- I didn't
21 verify it, but I was told that my equipment was
22 the first one the aircraft picked up coming back
23 from the bombings over in North Vietnam (crying).

24 Q. So your equipment was important?

25 A. Yes.

1 Q. Are you okay, Mr. St. John? Do you
2 need a break?

3 A. No.

4 Q. And you were the only man qualified to
5 work on that equipment?

6 A. Yes.

7 MR. SCHIRMER: Object to form. You
8 mean at that station?

9 A. I was the only one at the station that
10 was qualified to work on the equipment. Yes.

11 BY MR. JOSEPH ST. JOHN:

12 Q. Mr. St. John, where was the nearest
13 major military base to your duty station?

14 A. Say that again.

15 Q. How far away were you from the nearest
16 major military base?

17 MR. SCHIRMER: Object to form.

18 A. My home base was 200 miles south.

19 BY MR. JOSEPH ST. JOHN:

20 Q. Were you honorably discharged from the
21 Air Force, sir?

22 A. Yes.

23 Q. Have you been trained in the repair of
24 CRT televisions?

25 A. Yes.

1 Q. Have you, in fact, repaired CRT
2 televisions?

3 A. Yes.

4 Q. After you were discharged from the Air
5 Force, did you pursue advanced education?

6 A. Yes.

7 Q. What degrees, if any, did you receive?

8 A. Received a bachelor of science in
9 electrical engineer and a master of science in
10 electrical engineering.

11 Q. Who were your employers throughout
12 your career, sir?

13 MR. SCHIRMER: Object to form.

14 A. Southern Company, subsidiaries of the
15 Southern Company.

16 BY MR. JOSEPH ST. JOHN:

17 Q. While working at these subsidiaries of
18 the Southern Company, did your responsibilities
19 include the maintenance of high voltage
20 equipment?

21 A. Yes.

22 Q. Did your responsibilities include the
23 maintenance of high voltage power supplies?

24 A. Yes.

25 Q. Did your employers provide safety

1 training related to that high voltage equipment?

2 A. Yes.

3 Q. Did you ultimately have supervisory
4 responsibility for other Southern Company
5 employees?

6 A. Yes.

7 Q. Were you responsible for providing
8 safety training to those under your supervision?

9 A. Yes.

10 Q. Was that safety training related to
11 safely working on high voltage equipment?

12 A. Yes.

13 MR. SCHIRMER: Object to form.

14 BY MR. JOSEPH ST. JOHN:

15 Q. Mr. St. John, have you ever been an
16 instructor at the university level?

17 A. Yes.

18 Q. Can you tell us where and describe the
19 general nature of the courses you instructed?

20 A. On the university level, I was an
21 instructor at the University of South Alabama in
22 electrical engineering laboratories and courses.
23 I was an instructor for the University of
24 Southern Mississippi in their electrical
25 engineering technology program.

1 Q. Have you ever been an instructor at
2 the trade school level?

3 A. Yes, I have instructed at the trade
4 school level.

5 Q. Can you say where and describe the
6 general nature of the courses you instructed?

7 MR. SCHIRMER: Object to form.

8 A. The Birmingham -- Birmingham Joint
9 Industrial Board. It was a training program set
10 up by the brotherhood of electrical workers and
11 the electrical contractors to train the
12 apprentice electricians in their job.

13 BY MR. JOSEPH ST. JOHN:

14 Q. Were you responsible for providing
15 high voltage safety training to your students?

16 MR. SCHIRMER: Object to form.

17 A. Yes.

18 BY MR. JOSEPH ST. JOHN:

19 Q. Did you provide safety training to
20 your students?

21 A. Yes.

22 Q. Did that training that you provided to
23 your students include high voltage safety
24 training?

25 A. Yes.

1 Q. Mr. St. John, do you believe that
2 you're qualified based on knowledge, skill,
3 experience, and training and education to opine
4 on the safety of consumers opening the back of
5 their CRT televisions?

6 MR. SCHIRMER: Object to form.

7 A. Yes, sir.

8 BY MR. JOSEPH ST. JOHN:

9 Q. Mr. St. John, how many years did you
10 practice as an electrical engineer?

11 A. 31 years.

12 Q. Mr. St. John, on the basis of your
13 knowledge, skill, experience, training, and
14 education, including your 31 years of experience
15 as an electrical engineer working with high
16 voltage equipment, do you believe that it would
17 be safe for consumers to open the back of their
18 CRT televisions?

19 A. No.

20 MR. SCHIRMER: Object to -- finish.

21 BY MR. JOSEPH ST. JOHN:

22 Q. Allow me to reask the question, Mr.
23 St. John.

24 A. Okay.

25 Q. On the basis of your knowledge, skill,

1 experience, training, and education, including
2 your over 31 years of experience as an electrical
3 engineer working with high voltage equipment, do
4 you believe that it would be safe for consumers
5 to open the back of their CRT televisions without
6 professional assistance?

7 MR. SCHIRMER: Object to form.

8 A. No.

9 MR. JOSEPH ST. JOHN: Counsel, do you
10 have a brief recross?

11 - - -

12 EXAMINATION

13 BY MR. SCHIRMER:

14 Q. Sir, you said that you understood that
15 people -- classes were -- a class action was an
16 action where an individual person essentially
17 brings claims on behalf of a large group of
18 people. Is that -- is that your understanding?

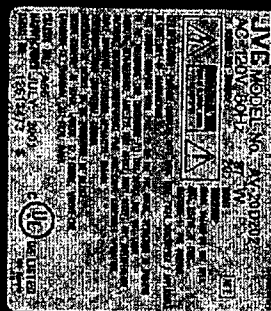
19 MR. JOSEPH ST. JOHN: Objection.
20 Mischaracterizes the testimony beyond the scope
21 of direct.

22 MR. SCHIRMER: No, it isn't. Sir, it
23 was my direct, by the way.

24 MR. JOSEPH ST. JOHN: Pardon me.
25 Beyond the scope of the cross, beyond the scope.

EXHIBIT

8A



PENGAD 800-631-6969

DEPOSITION

EXHIBIT # 8

11.2.15

St. 1

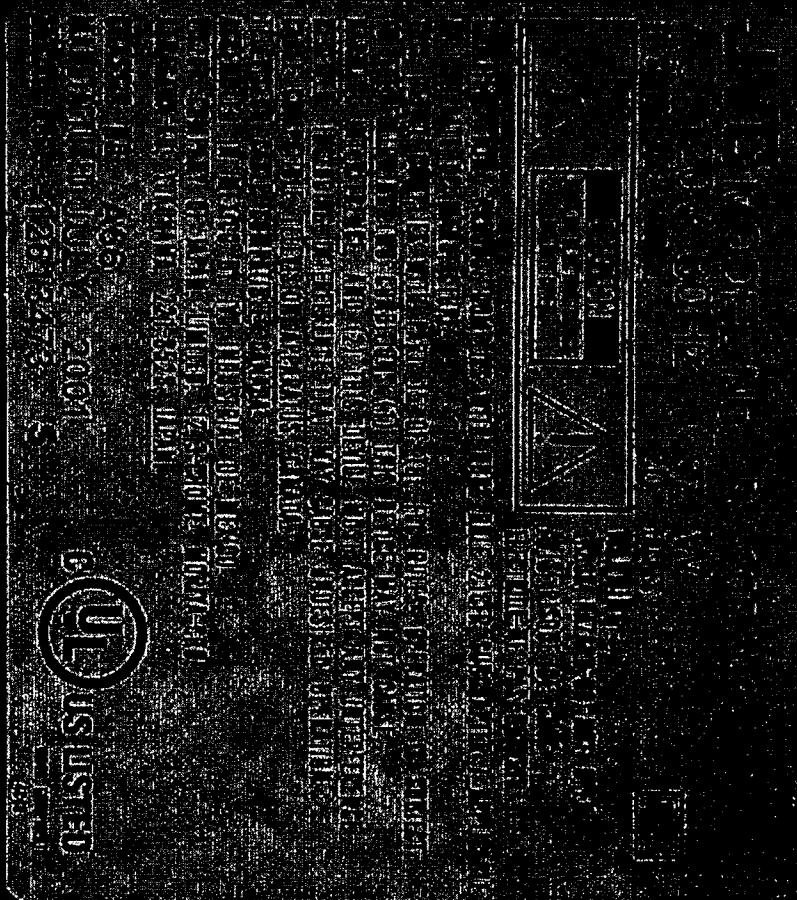
EXHIBIT

8B



EXHIBIT

9A



PENGAD 800-631-6868

DEPOSITION

EXHIBIT

11.2.5

St. in

EXHIBIT

9B

LC31139-001A-A

JVC MODEL No. **AV-20D202**

AC 120V 60Hz 87 W

TV SCREEN SIZE: DIAGONAL

20

INCHES

ME



WARNING:

SHOCK HAZARD-DO NOT OPEN.

AVIS: RISQUE DE CHOC

ELECTRIQUE-NE PAS OUVRIER.

CERTIFICATION -PRODUCT COMPLIES WITH DHHS RULE 21CFR SUBCHAPTER J APPLICABLE AT THE DATE OF MANUFACTURE.

THIS DEVICE COMPLIES WITH PART 15 OF THE FCC RULES. OPERATION IS SUBJECT TO THE FOLLOWING TWO CONDITIONS: (1) THIS DEVICE MAY NOT CAUSE HARMFUL INTERFERENCE, AND (2) THIS DEVICE MUST ACCEPT ANY INTERFERENCE RECEIVED, INCLUDING INTERFERENCE THAT MAY CAUSE UNDESIRE OPERATION.

CABLE COMPATIBLE TELEVISION APPARATUS, CANADA.

TÉLÉVISEUR CÂBLE COMPATIBLE, CANADA.

ASSEMBLED IN MEXICO BY JVC INDUSTRIAL DE MEXICO.

VICTOR COMPANY OF JAPAN, LIMITED. 12, 3-CHOME, MORIYA-CHO, KANAGAWA-KU, YOKOHAMA, 221-8528, JAPAN.

CHASSIS NO. **A66**

MANUFACTURED **JULY. 2001**

SERIAL NO. **12613473 S**



VIDEO EQUIPMENT
4C43

EXHIBIT

10

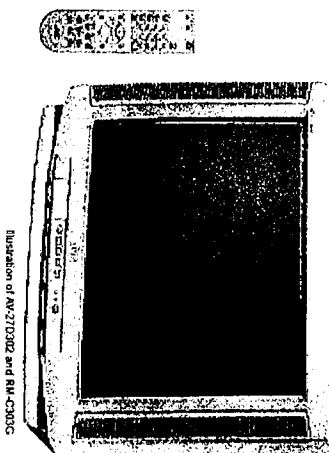
FD mini-1B 1/16/01 3:33 PM Page 1

JVC

COLOR TELEVISION

USER'S GUIDE

For models:
AV-27D302
AV-27D202
AV-20D202
AV-27Z30



IMPORTANT NOTE TO THE CUSTOMER

In the spaces below, enter the model and serial number of your television (located at the rear of the television cabinet). Staple your sales receipt or invoice to the inside cover of this guide. Keep this user's guide in a convenient place for future reference. Keep the carton and original packaging for future use.

Serial Number

Model Number
LC7824401A4
010778A1A4

FD mini-1B 1/16/01 3:33 PM Page 2

IMPORTANT SAFETY PRECAUTIONS

CAUTION

RISK OF ELECTRIC SHOCK DO NOT OPEN

CAUTION: To reduce the risk of electric shock, do not remove cover (or back). No user serviceable parts inside. Refer servicing to qualified service personnel.

The lightning flash with arrowhead symbol, within an equilateral triangle is intended to alert the user to the presence of uninsulated "dangerous voltage" within the product's enclosure that may be of sufficient magnitude to constitute a risk of electric shock to persons.

The exclamation point within an equilateral triangle is intended to alert the user to the presence of important operating and maintenance (servicing) instructions in the literature accompanying the appliance.

WARNING: TO PREVENT FIRE OR SHOCK HAZARDS, DO NOT EXPOSE THIS TV SET TO RAIN OR MOISTURE.

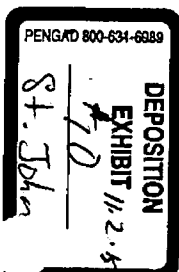
CAUTION: TO INSURE PERSONAL SAFETY, OBSERVE THE FOLLOWING RULES REGARDING THE USE OF THIS UNIT.

1. Operate only from the power source specified on the unit.
2. Avoid damaging the AC plug and power cord.
3. Avoid improper installation and never position the unit where good ventilation is unobtainable.
4. Do not allow objects or liquid into the cabinet openings.
5. In the event of trouble, unplug the unit and call a service technician. Do not attempt to repair it yourself or remove the rear cover.

Changes or modifications not approved by JVC could void the warranty.

- * When you don't use this TV set for a long period of time, be sure to disconnect both the power plug from the AC outlet and antenna for your safety.

- * To prevent electric shock, do not use this polarized plug with an extension cord, receptacle or other outlet unless the blades can be fully inserted to prevent blade exposure.



EXHIBIT

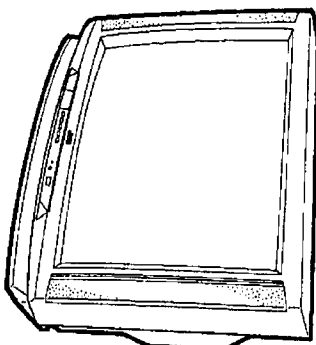
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AV-20D202

AV-20D202

JVC**SERVICE MANUAL****COLOR TELEVISION****AV-20D202/S**
AV-20D202R

BASIC CHASSIS
FD

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COPYRIGHT © 2001 VICTOR COMPANY OF JAPAN, LTD.

No.51789
Apr. 2001**SPECIFICATIONS**

Items	Contents
Dimensions (W x H x D)	23.36" x 18" x 18.14" / 592mm x 456mm x 457mm
Mass	45.0 lbs / 20.4 kg
Reception Format	NTSC, BTSC System (Auto-Circuit Sound)
VHF, UHF	VLF Band (02~06) 54MHz~88MHz VLF Band (07~13) 174MHz~216MHz UHF Band (14~59) 470MHz~805MHz
CATV	Low Band (02~06, A-B) by (02~06A01) High Band (07~13) by (07~13) Mid Band (A~1) by (14~22) Super Band (4~10) by (23~36) Hyper Band (W~1~W~28) by (37~54) Ultra Band (W~28~W~54) by (55~125) Sub Mid Band (A4, A4~A1) by (01, 96~99) 181 Channels
TV/CATV Total Channel	181 Channels
Intermediate Frequency	45.75MHz
Video IF Carrier	41.25MHz (4.5MHz)
Sound IF Carrier	3.58MHz
Cable Sub Carrier	120V AC 60Hz
Power Input	87W
Power Consumption	120W AC 60Hz
Picture Tube	20" (51 cm) Measured Diagonally
High Voltage	26.5kV ± 1kV (at zero beam current)
Speaker	2" x 3-1/2" / 5 x 8cm Oval type x 2
Audio Power Output	1.0W + 1.0W
Input terminal	Input 1 S-Video Video(Y) Audio(L, R) Input 2 Component Video Y, Pb, Pr Input 3 (Front) Video(Y) Audio(L, R)
Output terminal	Variable Audio Output (RL) More than 0~1500mV (16dB) Low impedance (400Ω when modulated 100%) (RCA pin jack)
Antenna terminal	75Ω (NF/UHF) Terminal, F-Type Connector
Remote Control Unit	RM-C104-1A (AA6LRUM-3 battery x 2)

Design & specifications are subject to change without notice.

2

No.51789

PENGAD 800-631-6969

DEPOSITION**EXHIBIT**

#1

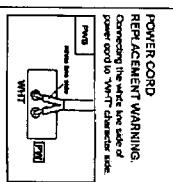
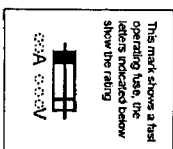
St. Jo

11.2.5

SAFETY PRECAUTIONS

1. The design of this product contains special hardware, many safety-related components, and other special features for continued protection. The components should be replaced only by original design unless authorized in writing by the manufacturer. Replacement parts must be identical to those used in the original circuits. Service should be performed by qualified personnel only.
2. Attention to the design or circuitry of the products should not be made. Any design alterations or additions will void the manufacturer's warranty and will further reduce the protection of the user against personal injury or property damage resulting from the use of the product.
3. Many electrical and mechanical parts in the products have special safety-related characteristics. These characteristics are often not evident from visual inspection nor can the protection afforded by them necessarily be obtained by using replacement components rated for higher voltage, wattage, etc. Replacement parts which have these special safety characteristics are identified in the parts list of Service Manual. Replacement parts should be obtained from the manufacturer or by ordering on the schematics and by (A) on the parts list in Service Manual. The use of a substitute replacement which does not have the same safety characteristics as the recommended replacement part shown in the parts list of Service Manual may cause shock, fire, or other hazards.
4. Use isolation transformer when hot chassis.
5. The chassis and any sub-chassis contained in some products are connected to one side of the AC power line. AC isolation transformer should be used when working on the chassis of the product and the AC power supply point while performing any service on some products when the HOT chassis is exposed.
6. Don't short between the LIVE side ground and ISOLATED (NEUTRAL) side ground or EARTH side ground when repairing.
7. The model's power circuit is partly different in the GND. The difference is GND (1) side GND and EARTH (2) side GND and ISOLATED (NEUTRAL) side GND or EARTH side GND and never measure with a measuring apparatus (oscilloscope etc.) the LIVE side GND and ISOLATED (NEUTRAL) side GND or EARTH side GND at the same time.
8. If above note will not be kept, a fuse or any parts will be broken. The fuse will be blown and the components will be damaged that the B1 setting should be checked or adjusted (See ADJUSTMENT OF B1 POWER SUPPLY).
9. The high voltage applied to the picture tube must conform with that specified in Service Manual. Excessive high voltage can cause an increase in X-Ray emission, aging and possible component damage. Therefore operation under excessive high voltage conditions should be kept to a minimum, or should be prevented. If severe aging occurs, remove the AC power supply from the power supply and the picture tube (after the power supply is disconnected, the picture tube should be removed from soldering, etc.). To maintain the proper minimum level of soft X-Ray emission, components in the high voltage circuitry including the picture tube must be the exact replacements or alternatives approved by the manufacturer of the complete product.
10. Do not check high voltage by drawing an arc. Use a high voltage meter or a high voltage probe with a VTVM. Discharge the picture tube after the high voltage is checked. When connecting a clip lead to the ground frame and connecting the other end of the lead through a 10KΩ 2W resistor to the inside button.
11. When service is required, observe the original lead dress. Extra precaution should be given to assure correct lead dress in the high voltage circuit area. Where a short circuit has occurred, those components that indicate evidence of overheating should be replaced. Always use the manufacturer's replacement components.

No. 51789



3

4

No. 51789

AV-20D202

FEATURES

- New chassis design enables use of a single board with simplified circuitry.
- Users can make fun to connect the Digital Video Disk player with the component video signal input terminal.
- Provided with miniature tuner (TV/CATV).
- Multidirectional remote control permits picture adjustment.
- Adoption of the CHANNEL, GLAUCO function prevents the specific channels from being selected, unless the "ID number" is key in.
- IC base control utilizes single chip ICs.
- Adoption of the VIDEO STATUS function.
- Adoption of the ON/OFF TIMER function.
- Built-in V-CRD system.
- With 750VU in common (F-type) ANT Terminal.
- SLEEP TIMER for setting in real time.
- Closed-caption broadcasts can be viewed.
- Built-in MTS system.
- Built-in HYPER-SURROUND system.
- S-VIDEO input terminal for taking best advantage of Super VHS.
- Variable Audio output terminal.
- 2 LINE Digital Comb Filter/Improved picture quality.

AV-20D202

AV-200202

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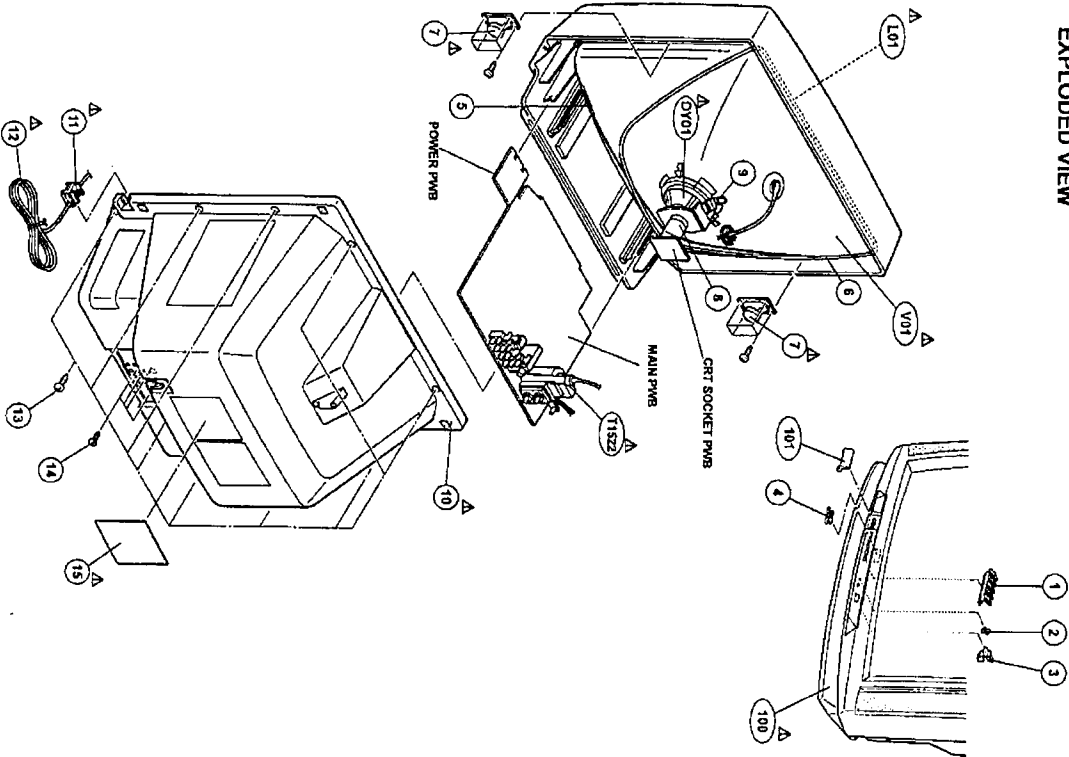
EXPLODED VIEW PARTS LIST

Part No.	Part Name	Description
Δ V01	AS11K689X(OT)	PICTURE TUBE (C)
Δ D101	Q900012-001	DET. COIL
Δ T1522	Q900013-002	DET. SHIELD
Δ 1	Q910013-002A-A	H.V. TRANSF.
Δ 2	Q910013-002A-A	CONTROL KNOB
Δ 3	Q930026-002A-A	POWER KNOB
Δ 4	CH43094-009-H	JVC MARK
Δ 5	A48457-4-5	SPRING
Δ 6	CH68016-0H	BRAIDED WIRE
Δ 7	CE42027-001	SPEAKER
Δ 8	CE42027-001	SPRING
Δ 9	CE42113-00A11	WEDGE ASSY
Δ 10	Q910013-00A11	REAR COVER
Δ 11	Q910013-00A11	POWER & CORD
Δ 12	Q930026-002A-A	TAPPING SCREW
Δ 13	Q930026-002A-A	TAPPING SCREW
Δ 14	Q930026-002A-A	ATTACH LABEL
Δ 100	Q930024-002A-A	FRONT CABINET ASSY
Δ 101	Q930024-002A-A	DOOR
		Inc. No. 101

30

No.51789

EXPLODED VIEW



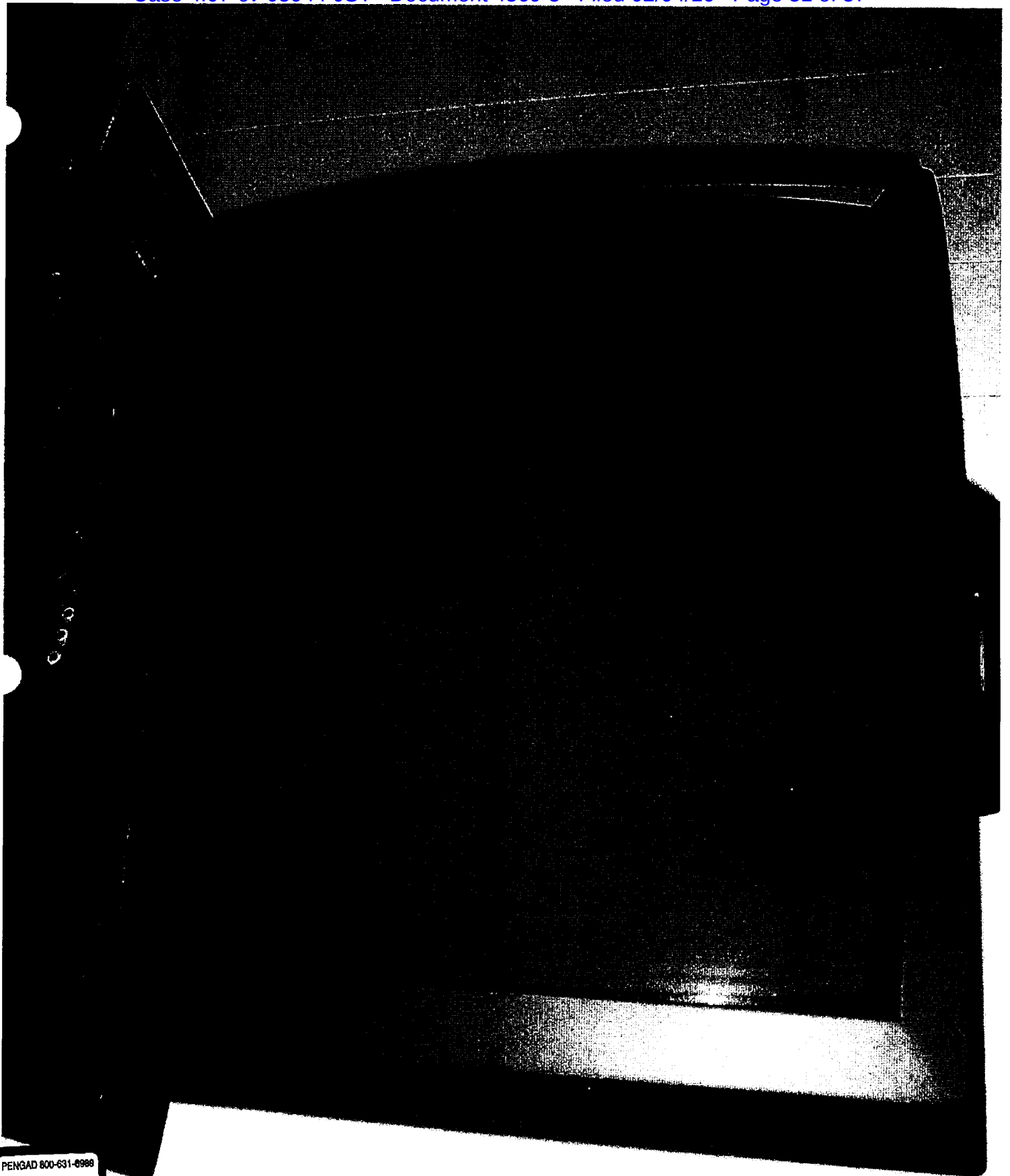
AV-200202

No.51789

31

EXHIBIT

12



PENGAD 800-631-6988
DEPOSITION
EXHIBIT 11-2-15
John

EXHIBIT

13A



PENGAD 800-631-6988
DEPOSITION
EXHIBIT
#13
11-2-15
S.A. 2

EXHIBIT

13B

Panasonic
COLOR TV



WARNING
RISK OF ELECTRIC
SHOCK

Model No.
No. de modèle

CT-25G7F



Chassis No.
No. de châssis

FP361

Serial No.
No. de série

LA22910569



Power Rating

Alimentation 120V~ 60 HZ

Max. Amps

Intensité

max. (A)

1.8

Manufactured

Fabrication

QAM

OCTOBER 2002

**ASSEMBLED IN MEXICO
ASSEMBLE AU MEXICO**

**PRODUCT COMPLIES WITH
RULES 21 CFR SUBPART
EFFECT AS OF DATE
OF MANUFACTURE.**

**DISTRIBUTED BY
MATSUSHITA ELECTRIC
CORPORATION OF AMERICA
ONE PANASONIC WAY
SECAUCUS, NEW JERSEY**

**THIS DEVICE COMPLIES WITH PART 15 OF THE FCC RULES. OPERATION IS SUBJECT TO THE FOLLOWING
CONDITIONS: (1) THIS DEVICE MAY NOT CAUSE HARMFUL INTERFERENCE, AND (2) IT MUST ACCEPT
AND INTERFERENCE RECEIVED, INCLUDING INTERFERENCE THAT MAY CAUSE UNDESIRABLE OPERATION.**

EXHIBIT

14

Panasonic®

Color Television

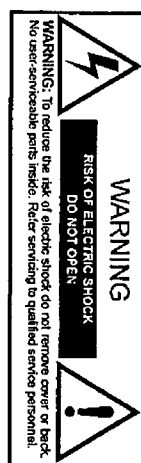
Operating Instructions

CT-2017	CT-G2132	CT-G2972
CT-25G7	CT-G2132L	CT-G2972L
CT-25G7U	CT-G2172	CT-G3352
	CT-G2172L	CT-G3352X

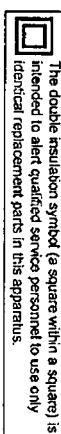


For assistance, please call: 1-800-311-PANA (7262) or
send e-mail to: consumerproducts@panasonic.com (USA only)

TOB2AA0370 10412
PRINTED IN USA



WARNING: TO REDUCE THE RISK OF FIRE OR ELECTRIC SHOCK, DO NOT EXPOSE THIS APPARATUS TO RAIN OR MOISTURE.



FCC CAUTION: ANY CHANGES OR MODIFICATIONS TO THIS TV RECEIVER NOT EXPRESSLY APPROVED BY MATSUSHITA ELECTRIC CORPORATION OF AMERICA COULD CAUSE HARMFUL INTERFERENCE, WHICH WOULD VOID THE USER'S AUTHORITY TO OPERATE THIS EQUIPMENT.

ENVIRONMENTAL NOTICE: THIS PRODUCT UTILIZES BOTH A CATHODE RAY TUBE (CRT) AND OTHER COMPONENTS THAT CONTAIN LEAD. DISPOSAL OF THESE MATERIALS MAY BE REGULATED IN YOUR COMMUNITY DUE TO ENVIRONMENTAL CONSIDERATIONS FOR DISPOSAL OR RECYCLING INFORMATION. PLEASE CONTACT YOUR LOCAL AUTHORITIES, OR THE ELECTRONICS INDUSTRIES ALLIANCE: [HTTP://WWW.EIA.ORG](http://www.eia.org)

